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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 15-0402 MMC
)	
)	UNITED STATES' MOTION FOR DETENTION
)	
v.)	
)	
KORI NICOLE ELLIS,)	
)	
Defendant.)	
)	

UNITED STATES' MOTION FOR DETENTION
NO. CR 15-0402 MMC

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1 **I. INTRODUCTION**

2 The defendant has been indicted for violations of Title 18, United States Code, Section
3 2252(a)(4)(B), possession of child pornography, Title 18, United States Code, Section 2252(a)(2),
4 receipt of child pornography, Title 18, United States Code, Section 2252(a)(2), distribution of child
5 pornography, and Title 18, United States Code, Section 2251 (a) and (e), production of child
6 pornography. Because the defendant poses a risk of flight and a danger to the community, and because
7 no reasonable condition or combination of conditions will reasonably assure her appearance in court or
8 assure the safety of the community, the government respectfully submits this memorandum in support of
9 its motion that she be detained pending trial.

10 **II. ARGUMENT**

11 **A. There is a Presumption in Favor of Detention in the Bail Reform Act**

12 Under the Bail Reform Act of 1984, 18 U.S.C. Sections 3141 *et seq.*, there is a presumption that
13 a defendant should be detained pending trial in cases where there is probable cause to believe that the
14 defendant committed an offense involving a minor victim. The basis of this presumption is that no
15 condition or combination of conditions will reasonably assure the appearance of the person as required
16 and the safety of the community. 18 U.S.C. §3141(e)(A). *See United States v. Salerno*, 481 U.S. 739,
17 750 (1987) (“The act operates only on individuals who have been arrested for a specific category of
18 extremely serious offenses....Congress specifically found that these individuals are far more likely to be
19 responsible for dangerous acts in the community after arrest.”) (citation omitted); S.Rep. No. 98-225, p.
20 6-7 (1983), reprinted in 1984 U.S.C.C.A.N. 3182, 3189; *United States v. Koon*, 6 F.3d 561, 566 (9th Cir
21 1993) (justifying the presumption of dangerousness in 18 U.S.C. § 3142(f)(1) because “there is a small
22 but identifiable group of particularly dangerous defendants as to whom neither the imposition of
23 stringent release conditions nor the prospect of revocation of release can reasonably assure the safety of
24 the community or other persons”). Where the presumption applies, the burden shifts to the defendant,
25 although the burden of persuasion continues to rest with the government. *United States v. Hir*, 517 F.3d
26 1081, 1086 (9th Cir. 2008). Even if the defendant proffers evidence to rebut the presumption in favor of
27 detention, “the presumption remains in the case as an evidentiary finding militating against release, to be
28

weighed along with other evidence relevant to factors listed in § 3141(g).” *Hir*, 517 F.3d at 1086 (citation omitted).

The factors that the Court must consider in assessing flight risk and danger to the community are set forth in 18 U.S.C. § 3142(g). As paraphrased, those factors are: (1) the nature and seriousness of the offense charged; (2) the weight of the evidence against the defendant; (3) the defendant’s character, physical and mental condition, family and community ties, past conduct, history relating to drug and alcohol abuse, and criminal history; and (4) the nature and seriousness of the danger to any person or the community that would be posed by the defendant’s release. *Id.* A finding by the Court that the defendant is a risk of flight must be supported by a preponderance of the evidence, while a finding that the defendant poses a danger to the community must be supported by clear and convincing evidence. *United States v. Townsend*, 897 F.2d 989, 994 (9th Cir. 1990); 18 U.S.C. § 3141(f)(2)(B).

B. The Defendant Should Be Detained Pending Trial

1. The Charged Conduct

In this case, the defendant is charged with violations of Title 18, United States Code, Section 2252(a)(4)(B), possession of child pornography, Title 18, United States Code, Section 2252(a)(2), receipt of child pornography, Title 18, United States Code, Section 2252(a)(2), distribution of child pornography, and Title 18, United States Code, Section 2251 (a) and (e), production of child pornography.

a. The Defendant’s Conduct Involving Minor Victims Demonstrates Danger to the Community

During the execution of a state search warrant at the defendant’s residence, San Francisco Police officers and FBI agents found electronic devices containing child pornography. Forensic analysis of those devices revealed over 600 images and 48 videos of child pornography involving minors as young as one year old. There were approximately 140 images and 24 videos involving toddlers. There were 46 images and one video involving bondage. One example of child pornography found on the defendant’s laptop is an image of an approximately 9 to 11 year old naked prepubescent juvenile female. Her arms and legs are bound together with red rope exposing her undeveloped vagina and undeveloped

breasts. A video shows an approximately 4 to 6 year old prepubescent juvenile female. She is lying on her bed with her legs spread open exposing her undeveloped vagina. An adult male then lies next to her and begins rubbing her vagina. He then has the child lay on her back and has vaginal intercourse with her with his erect adult penis. Yet another video shows an approximately 1 to 3 year old prepubescent juvenile female. The child is completely naked lying on her back on a bed, exposing her undeveloped vagina. An adult male begins to tap and insert his erect penis into her vagina. The child then performs oral copulation on the adult's penis. The child is then turned over on her stomach and the adult begins to lick her vaginal area. The child then performs oral copulation on the adult's penis again.

As graphic and disturbing as these images may be, this is more than the average child pornography possession case. In addition to the files of child pornography that were found, officers and agents discovered several text messages and chats between the defendant and various other individuals. The defendant used the messenger application "Kik" to chat with other pedophiles and trade child pornography. Some of the chats accompanying the distribution and receipt demonstrate the defendant's arousal at watching as others abuse children and her willingness to participate in such an act. (The defendant's messages are in bold.)

On February 12, 2015, the defendant chatted with user "your exhibit" and sent videos of child pornography:

- **But are u ok with one (well 2 actuakky) of them beign – u know; my fave filthy taboo subject matter... (the Michael me flashback subject matter) lol**
- You know I am!
- **The kind**
- You know I love it too ... SEND
- **Well never actually sent u any before that's all**
- My cock needs it
- **And now I think I decided to send u 2 now**
- Holy fuck that was hot, send another

The defendant then sent "your exhibit" a thumbnail of a video that could not be played.¹ The thumbnail was a close up shot of an undeveloped vagina of an approximately 7 to 9 year old prepubescent juvenile female.

- **I swear to god if u cum from watching this one I will fucking end u... the last vid is a combo of these vids subject matter... did u like it?**

¹ The hyperlinks had been deactivated or were expired so their content could not be viewed.

- OMG
- **I knowwwwwww**
- That would be our daughter
- **The way he pops the head in**

The defendant sent another thumbnail of a video that was unable to be played. The thumbnail showed a naked prepubescent juvenile female, approximately 5 to 7 years old. The child is blindfolded and her arms appeared to be bound with yellow rope above her head. A dog appears to be licking her genitalia.

On February 24, 2015, the defendant sent user "Sammie Strong" two thumbnails of the same videos that she had sent "your exhibit." After sending them, she sent the following message: "Enjoy this other vid – its like 8 mins long and hot too."

On March 19, 2015, the defendant began communicating with a Kik user "atwozed." On March 21, 2015, "atwozed" sent the defendant an image depicting the lower portion of a 4-6 year old boy's anus and penis. The boy is on his back exposing his undeveloped penis and it appears that the external opening of his rectum is open. An erect adult penis is seen right next to his anus.

- **Mmmmmmm**
- I tried to contact u a few times when I with kids so u could watch
- **Mmmmmmm fucking hot**

The defendant then sent "atwozed" the same thumbnail she had sent "your exhibit" and "Sammie Strong." The user "atwozed" then sent the defendant an image depicting a naked prepubescent juvenile male 5 to 7 years old. His undeveloped penis is exposed to the camera. He is lying on his back on top of an adult male. An erect adult penis is inside of his anus. The defendant replied, "**Mmmmmmm. Would luv to wrap my mouth around his lil ...**"

The user "atwozed" then sent the defendant an image depicting the lower portion of an undeveloped male boy's anus and penis. The boy is 3 to 5 years old. The boy is on his back exposing his undeveloped penis and it appears that the external opening of his rectum is open. An adult male is holding the boys butt cheeks apart.

- **Fuck ... or I'd be straddling his face and sucking him (69ing, essentially) With that cock in his ass**
- Fuck yea baby
- **Omg, somebody went deep in that asshole. Mmmmm. Are u still in sac?**
- Ya

The user “atwozed” then sent the defendant an image is of a naked prepubescent juvenile girl approximately 1 to 2 years old. The child is on her back exposing her undeveloped vagina. An erect adult penis is above her vagina and appears to have ejaculated semen all over her undeveloped vagina.

Officers and agents found hundreds of text messages between the defendant and another individual that further demonstrate her predatory desire to observe, encourage, and engage in the abuse of children. The other individual describes actual sexual abuse of children, including getting oral sex from a minor in a Target bathroom, masturbating at a park, groping children at Bay to Breakers and “sneaking in pokes” while his niece is sleeping. The defendant responds with approval and encouragement, talking about how “hot” his acts are, asking for pictures, and expressing an interest in participating. The two in fact discuss future plans to exploit children. When she was arrested, the defendant admitted that she had met this guy in person and that they would watch child pornography together and “hook up.” Excerpts of their chats are as follows:

March 19, 2014

- Getting head from a sml person as we speak... thought u should know;)
- **But... pics or it didn't happen :)**
- Nope, had to do it quickly in a Target bathroom lol, but I kept a token of my triumph... one sec
- *Patrick then sends a photo of a pair of female children's underwear*
- **Omfgggggg. Target bathroom??! OK if that's actually true we gotta hang out soon, so u can tell me all about it! Omg I cant even imagine how u ended up in that situation!! And yeah I wish I was there too!**
- It was an ordeal lol
- **Holy shit u are sooooo piquing my interest! Grrr!**

April 7, 2014

- I'm just being a p3² right now and had to share
- **Oh nice**
- Indeed :) @ the park now stroking it
- **Omfg... u know I want details... Or Skype me! Where r u btw?**
- In Novato, are you free tonight? Weill im free and would love for ya to play with my p3 cock
- **Come over... please? Im caving your p3 cock. Dang why did I only copy 2 files when u were here? I should have my head examined, Im still dying to hear your p3 story ... killin me**

April 10, 2014

- **Just realized that I live right by a school or something because I just heard the sounds of k1d5 on a playground... the thing is...**
- Damn lol what kind of school?

² P3 and P3do are slang terms for pedophile.

- **What kind of school do u THINK I mean – fuckin sf state or some college? Hell nah... U know what kind of school :) I sooo want you P3 fuck meat inside my cunt right about nowwww**

April 28, 2014

- **Whats up my p3 idol, u should go jack in the park... Or wheevr u might be seen but not caught**
- If I end up groping one ill take a pic for ya
- **Mmmm vid, and u can just have ME hold the camera. Im watching one of my favorite videos for inspiration**

April 29, 2014

- **Thought we we're gonna go ... hunting... at like 7. Im in monster mode – not safe**
- Til 9. But ill give you a call as soon as im off
- **Psssh ... u know they will be long asleep by then, but im sure we could find some way to keep our filthy selves occupied... Im watching yummy vids :)**

May 18, 2014

- Im up just p3ing away lol
- **Mmmm Niiice**
- Its Bay to brakrs tomorrow... Im grabbing as much lil ass as I can in the crowd
- Got my finger deep in one, then disappeared in to the crowd! Fuck that was awesome
- Ya no worries do your thang. Let me know if you want me to cum by. I had an eventful p3 today and would love to share :)
- **Pics or it didn't happen! But don't forget to be a cautions p3**

September 26, 2014

- Im gonna take a video of me stroking my cock at the park :) Im heading to the park now. School got out recently
- **Mmmmm Elementary I hope, don't say high school, u can lie**
- Middle skl... but there are always little ones there
- **Mmmm u gonna jerk in car... or flash from afar... or?**
- Jerk in the car for now. There are too many people at this time. Once I see a couple walking home ill flash

September 27, 2014

- Lol ill pin one down in broad daylight next time I see ya then. One last hoorah before I get hulled off to jail

October 1, 2014

- **Go to the school make a vid.. u know.. jerkin.. then come back**

January 1, 2015

- Oh just chatting with my lil friends
- **Mmmmm cum over and stick that predatory cock inside my cunt while whispering what you've been doing with them**
- Its not that my brother and his family showed up ... niece is sleeping... im sneaking in pokes
- **Mmmmm, you should take a pic or video and send it to me (of a sneaky moment) I promise id delete it right after I watch it**

The defendant also had a Skype messenger installed on her iPhone. The defendant chatted with

Craig Forbes and Sarah Gotham, a couple from the United Kingdom who sexually abused their young daughter on live cam for her.³ Excerpts of the chats between the defendant and Craig Forbes are as follows:

December 4, 2013

- **Wanna cam? Hmmm.. what kindaaa cam did u have in mind... is the lil one asleep already??!**
- It's just me tonight sarans out and lil ones away
- **So do u guys play like u did before...like u used to do on cam with/for me...with sleeping beauty, (giggle), I soooooo miss those shows**
- Can I call u, easier to talk

Later on December 4, 2013

- Just wanted to tell u all our new experience
- **Hmmm**
- Get worried typing
- **Totally understand that**
- That couple really wanna see u
- **Oh really, I really wanna see them**
- And their family

Excerpts from the chats between the defendant and Sarah Gotham are particularly vile, disturbing, and indicative of the true danger that the defendant poses to the community:

February 19, 2014

- Ok iv been baby sitting my 1 yr old niece xxxx
- **Mmmmm nice**
- Have you heard from craig? He said he thought you were ignoring him lol xxxx His cock fitted inside her after loads of work
- **I think u guys spoiled me when u cammed me before... and left me always hoping I'd see that again whenever u guys were online**
- Is 1 too young for u thought there are lots of crying and some blodd don't want to put u off
- **I just luv watching u guys... So hot, so to answer ur question -no**

February 20, 2014

- We have so many new tricks and we also have new friends with 3 daughters aged between 1 and 5, they live just around the corner from us
- We were with our friends last night the father is such a relentless pedophile xxxx
- **Hehe**
- I have found out that I love the taste of young blood mixed with shit

February 22, 2014

- Can I ask you something
- **Always, but if its .. u know what related, I'd maybe rather cam**

³ This information was communicated to FBI Agents in the United Kingdom who have launched an investigation into the couple. The FBI office in England identified the two suspects "Craig Forbes" and "Sarah Gotham" and confirmed that, at the time they were located, the couple had a 9 year old daughter and lived with three other children, ages 1, 2, and 5.

- Have you had any new experiences on cam at all?
- **Nope... sigh, you guys spoiled me... lol**
- Iv checked up and once a Skype convo has been deleted on both sids, there is no way what so ever it can be retrieved
- **Even still .. can never be too safe, u know?**
- U really miss out last night I haven't slept so tired but so worth it
- **Mmmmmmm omg so hot**
- I tell crag before they come round that he has to make at least one of them bleed so I can tast it on his cock
- **I would luuuuuuuuv to see, naughty naughty slut**
- Love the screams makes me wet
- **And the friends are watching?**
- I get off moer on the crying, yes they usually just watch n have they never really join in, iv been sharpening my fingernails so when im fingering there asses the bleed on me n taste of that mixed with ther poo is like a drug
- **Oh my :)**
- I know it was you that got me into the hurt thing originally
- **Mmmmmmm, that's fucking hottttt**
- He was forcing his cock down her throat while she in floods of tears and im slapping her body really hard leaving hand prints and I shout at her telling her to SHUT UP
- **:) is your pussy getting wet... I bet it is**
- Where's my P queen XXX

February 24, 2014

- My lil one is active
- **Mmmm tell me about sleeping beauty**
- She really likes tongue kissing craig
- **Oh my fucking gawd, THAT IS SO HOT, I'd rather see that AAAAAny day that's so naughty, but in an innocent way**
- They were at it for ages the other night I watched n masturbated see in his hands down her shorts while they kissed
- **omg what else, pleeeeeease tell me?**
- We make sure she doesn't wash for a week n shes not allowed to wipe her ass hole after a poo
- **Mmmmmmm**
- Yes we are always naked, ive taught her how to suck that huge cock of his while I bury my face in her ass
- **Omg its too hot, we need to cam again soon**
- Would you play with her if you came to stay
- **Well you should know by now that im a good girl... and LUV doing what im told**
- Please tell me what u would do to her
- **Lick her to get ready, and would want him to cum on her pussy and make me lick it clean**
- I knew you were a peedo for real xxxxx
- **Hahahahaha**
- Please I am a pedophile
- **Hope we can cam soon u sexy little p3do slut**

February 26, 2014

- Our friends are coming over they will only bring one of there girls is the 2 yr old ok
- **Mmmmm when? Now?**
- Tonight at 7 will you be ok with tears? So tell me what u wanna see xxx, we wanna show you this u need to see both holes xxxxx

Not only did the defendant engage in the aforementioned predatory conduct, she also used Kik to chat with underage males and entice them to send her photographs of themselves and their penises. The first boy, referred to as "Minor 1," was fifteen years old at the time the defendant was preying on him.⁴ In chats, she told him, "Your innocence is what I like" and "It's hot as fuck that you're fifteen." Excerpts of the chats are as follows:

October 11, 2014

- **U said you'd send me One first so id know the 72 isn't ur age or year born**
- My profile pic?
- **I see ur torso... But anyone can send a pic of anyone's torso**
- *Minor 1 then sent a photo of himself.*
- **Wow this app is trippy. Um so now u want one of me?**
- Yes
- *The defendant then sent two pictures of herself.*
- **I wanna meet a youngerrrr guy to cam with, regularly ... to see and be seen. And ur innocence is what I like – showing you things you've never seen**
- U show really show
- **I met a 14 yo guy randomly once on omegle and it was cool to cam with him, being a slut for someone who hasn't seen anything like it before is hot. Id luv to see ur expression to my body**
- What parts
- **Whatever u wanted to see eventually, would u show me yourself too?**
- Yes will send pics too
- **How old are u again?**
- 15
- **Mmmmmm, its hot as fuck that ur 15**
- Well I like older women
- **Where do u live**
- Wisconsin
- **If I showed u my tite pussy would U show me ur cock**
- YES!!
- **U first and real time pic and I have to send gallery pic becuz im not alone**
- OK well maybe some other day u could send a real time one too, maybe tomorrow and hang on
- *Minor 1 then sent two photos of an erect penis.*
- **Mmmmmm wow fuxk, good boy**
- *The defendant then sent Minor 1 a picture of an adult vagina.*
- O.M.G
- **First I'd grab u and slowly kiss u ... deep with tongue while I reached down and felt your cock growing, over ur jeans, then I'd ask if u wanted to see a woman's boobs for the first time then touch them, So I'd be rubbing my hips slowly against your hard as fk young cock**
- I want in u!
- **And I want mine to be the first!**

⁴ SFPD Sergeant Servat found a Facebook account of an individual whose profile matched that of Minor 1's Kik account. Minor 1 was traced to a high school in Wisconsin. A police officer in that city confirmed that Minor 1 is fifteen years old. The officer located Minor 1 who identified the Kik account as his, told officers that he was the only one who used it, and identified the photo that he sent to the defendant as a photo of himself.

- **Fuck im sooooo wet and my friends are looking at me funny! I swear they must have some idea im being pervy and about to let a 15 yr old boy finger fuck my little cunt**
- *They continue to have a graphic sexual conversation.*
- **Omg hold on – I wanna see it go in.. grab ur phone and video it see ur cock enter my asshole**
- *The defendant then sends a photo of an adult vagina to Minor 1.*
- *Minor 1 then sends two photos of an erect penis.*

The second underage male with whom the defendant communicated was fourteen years old at the time she was chatting with him.⁵ Minor 2 sent photos of his erect penis to the defendant who also sent him photos of an adult vagina as they engaged in graphic sexual conversation.

That the defendant is a predator is clear. She possessed, traded, and engaged in the production of child pornography. Moreover, she has encouraged other pedophiles to molest children and capture the act on film for her while also indicating her own interest in participating in such an act. The defendant herself refers to “monster mode” when she is chatting about her pedophilic urges. Thus, the charged conduct demonstrates that the defendant poses a true danger to the community.

b. The Penalties Associated with the Charged Crimes Create a Risk of Flight

An assessment of the nature and circumstance of the charged offense includes consideration of the penalties. *United States v. Townsend*, 897 F.2d 989, 995 (9th Cir. 1990). The defendant is charged with distribution and receipt of child pornography and faces the potential of a mandatory minimum of five years’ incarceration for those charges. She is also charged with two counts of child production; a charge which carries a mandatory minimum of fifteen years imprisonment and a maximum term of thirty years imprisonment. These mandatory minimum sentences, when coupled with exposure to thirty years in prison, provide considerable incentive for the defendant to flee. *Townsend*, 897 F.2d at 995 (“Facing the much graver penalties possible under the present indictment, the defendants have an even greater incentive to consider flight.”).

⁵ Minor 2 was traced to Edmond Oklahoma. A detective with the Edmond Police Department confirmed that he was 14 years old during the time the defendant was chatting with him. When interviewed, Minor 2 stated that he remembers chatting with the defendant’s Kik profile and that he had sent her nude photos of himself at her request. He stated that he freaked out and stopped communicating with her and then blocked her on Kik.

1 **2. There is Considerable Evidence Against the Defendant**

2 Although the weight of the evidence is the least significant factor in the analysis of danger to
3 the community, it is nonetheless relevant. *United States v. Winsor*, 785 F.2d 755, 757 (9th Cir. 1986).
4 In this case, there is considerable evidence against the defendant. The government has extensive
5 evidence from the search of the defendant's iPhone, laptop, and thumb drive. The defendant also gave a
6 Mirandized statement during which she confessed to the charged conduct.

7 **3. The History and Character of the Defendant**

8 The defendant does not have any criminal record. However, her history does indicate that she
9 poses a risk of flight. Specifically, she has no known family or community ties to the Northern District.
10 Her questionable ties to the district along with the nature of the charges she is facing and the lengthy
11 prison sentences attached to those charges indicate that the defendant is a flight risk.

12 **4. The Defendant Poses a Grave Danger to the Community**

13 The threat posed by the defendant should she be released prior to trial takes several forms. Her
14 behavior is so offensive to even the most basic moral and social principles, and so damaging to any child
15 unfortunate enough to cross her path, that there are no conditions that could protect future victims. Her
16 compulsion to corral and encourage pedophiles to act on their sexual appetite for children and to capture
17 it on film in order to be published is as dangerous as the pedophiles themselves. Moreover, she has
18 indicated in several chats her own desire to participate in the abuse of children. This deviant behavior is
19 precisely what those who purport to protect children need to stop. Individuals capable of this level of
20 depravity pose a grave danger to the community, particularly when faced with the prospect of a long
21 prison term, when there is "nothing left to lose."

22 **III. CONCLUSION**

23 For the foregoing reasons, the government respectfully requests that the defendant be detained
24 pending trial, on the basis that she presents a risk of flight and a danger to the community and that there

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1 exists no combination of conditions that would mitigate this risk or danger.

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4 MELINDA HAAG
United States Attorney

5 DATED: August 18, 2015

6 /s/
SARAH HAWKINS
Assistant United States Attorney
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